

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

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Kevin H. Sharp

PRECISION PUMP & GEAR, INC.,)	
)	
Plaintiff/Counterclaim Defendant,)	JURY DEMAND
)	
v.)	Case No. 2:13-cv-00022
)	
DACCO, INCORPORATED,)	Judge Kevin H. Sharp
)	
Defendant/Counterclaim Plaintiff.)	

**MOTION FOR LEAVE TO APPEAR BY TELEPHONE
AT CASE MANAGEMENT CONFERENCE**

Defendant/Counterclaim Plaintiff DACCO, Incorporated (“Defendant”), by and through undersigned counsel, respectfully moves the Court for an Order granting counsel for Defendant Andrea, M. Kimball (*pro hac vice* motion pending), leave to attend the Initial Case Management Conference, currently scheduled for 10:00 a.m., November 4, 2013 in Cookeville, Tennessee, by telephone. In support of this Motion, Defendant further states:

1. This Court set the Initial Case Management Conference for 10:00 a.m., November 4, 2013 in Cookeville, Tennessee (Doc. 9).
2. Counsel for Defendant, Andrea Kimball, offices in Kansas City, Missouri and has shared custody of her children. The childrens’ other parent is out of town for six weeks for work, so Ms. Kimball has the children full time during that week, making travel difficult. Judge Sharp’s Practice and Procedure Manual, Section II.C., states “the Judges, upon request, generally will attempt to accommodate out-of-town counsel or other circumstances unique to the case by permitting joint telephone conferences with the court....”
3. Counsel for Plaintiff consents to this request, and will not be opposing this motion for Ms. Kimball to attend the Initial Case Management Conference by telephone.